

will not receive the necessary software updates until November or December, 1995. Obviously, this switch modification process was not simple. 800 database functionality does not have, nor was it designed to have, the functionality to perform database queries for numbers other than 800. If it were determined that IN is the appropriate vehicle for provision of 500 and 900 service provider portability, far longer than six months would be required to make the modifications in the switch software and subsequently to install and test it across all LEC networks.

The Teleservices request that 900 portability be implemented at the same time as 888 portability is not feasible. If the industry began immediately to modify the IN platforms and the corresponding database structures to include 900 portability, the March 1996 implementation date for 888 service would not be attainable. The 888 service implementation is necessarily a critical step that, if not done properly, could impact all 800 traffic. Stopping that process, or complicating it and delaying it due to additional number portability requirements, would not be in the public interest.

MCI asserted that existing Advanced Intelligent Network ("AIN") installations can easily be modified to provide 500/800 service provider portability.⁴⁶ While AIN is a powerful tool, the current release of AIN does not include the necessary functionality to provide database queries at the access tandem for non-equal

⁴⁶Comments of MCI at 29-40.

access end offices that subtend the tandem. This configuration is quite prevalent in the independent telephone company world and would prevent them from participating. Since MCI argues that independent telephone companies must be required to participate,⁴⁷ then AIN is not a near-term solution. Switch vendors are currently evaluating the changes that will be required to AIN software to remedy this situation. In the meantime, AIN should not be viewed as a vehicle for quickly implementing 500 or 900 service provider portability.

C. THERE ARE NO REAL BENEFITS ASSOCIATED WITH MANDATING 500/900 SERVICE PROVIDER PORTABILITY.

Several commenting parties alleged that significant benefits will flow from service provider portability for 500 and 900 services. MCI claimed that usage of 500 service is limited because of the lack of service provider portability.⁴⁸ 500 service, however, is still in its infancy, and the market has yet to identify with it. As AT&T pointed out, 500 service is just emerging, and it is too early to determine what impact, if any, number portability among service providers would have.⁴⁹ It is difficult to sustain an argument that a service that is at its earliest stage of public acceptance could be negatively affected by the lack of service provider portability.

⁴⁷Comments of MCI at 39.

⁴⁸Id. at 25.

⁴⁹Comments of AT&T at 39-41.

With respect to 900 service, the benefits of service provider portability are difficult to identify. Teleservices asserted that service provider portability for 900 service will reduce prices, stimulate growth, improve the quality of the programs, and meet the Commission's goal of moving pay-per-call services to the 900 NPA.⁵⁰ None of these claims is substantiated with facts or cogent arguments. The issue of price reduction was discussed above. Stimulation of growth could result in lower prices, but it will not necessarily do so. 900 service is facing many problems that have nothing to do with service provider portability. Consumers throughout the serving area of Southwestern Bell Telephone Company have requested that their phone lines be blocked from accessing 900 numbers (in Texas, more than 2 million lines are blocked). Widespread customer rejection is not an attribute of a growing business that would justify millions of dollars in expenditures to introduce service provider portability.

Teleservices' claim that service provider portability will further the Commission's goal of moving pay-per-call services into the 900 dialing plan is difficult to understand. Allowing information providers to move from carrier to carrier while retaining the same telephone number is not likely to incent those providers to move from the 800 service to 900 service. Indeed, as long as 900 blocking is growing, the opposite result is likely to occur.

⁵⁰Comments of Teleservices at 3-7.

The Commission should examine closely the claims that extravagant benefits will flow from 500 and 900 service provider portability, because those claims are unsubstantiated. The Commission should not attempt to fix something that is not broken.

VIII. CONCLUSION

The Commission should assume a leadership role in developing a national number portability policy, focused on broad policy development. While details of implementation of any number policy should be deferred to appropriate industry and standards groups, SBC strongly supports a national approach to number portability policy, not a piecemeal, state-by-state approach. The final, long-term number portability solution should be driven by end user demand and willingness and ability to pay for the service, not by regulatory mandate. Care must be exercised in selecting and utilizing interim solutions to number portability, because those solutions potentially introduce problems, complications, and delays to the long-term solution. Any number portability solution developed by appropriate industry groups must support operator services functions, as well as E911/911 services. The analysis of

service provider portability associated with wireless services should be separated from the analysis of wireline portability. Finally, number portability related to non-geographic numbers must be analyzed separately from number portability related to geographic numbers.

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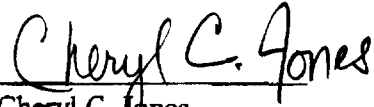
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CERTIFICATE OF SERVICE

I, Cheryl C. Jones, hereby certify that copies of SBC Communications Inc. Reply Comments have been served by first class United States mail, postage prepaid, on the parties listed on the attached.


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